

EXHIBIT C

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

Case No.

UBER TECHNOLOGIES, INC.; 3:17-cv-00939-WHA

OTTOMOTTO LLC; OTTO TRUCKING,

INC.,

Defendants.

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF CHELSEA BAILEY

PALO ALTO, CALIFORNIA

TUESDAY, AUGUST 1, 2017

BY: ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~

CSR LICENSE NO. 9830

JOB NO. 2668970

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1 possession of two laptops that had been previously 18:16
2 issued to Mr. Levandowski? 18:16
3 A I believe so. My recollection is very vague. 18:16
4 Q Okay. What did you do with those laptops? 18:16
5 A The laptops were provided to a coordinator on 18:16
6 my team, Travis Belanger. 18:16
7 Q Can you spell Mr. Belanger's last name? 18:16
8 A Belanger, B-E-L-A-N-G-E-R. 18:16
9 Q And why did you give the laptops to 18:17
10 Mr. Belanger? 18:17
11 A That's standard practice for turning in an 18:17
12 employee's equipment that's provided during an exit 18:17
13 interview. 18:17
14 Q Okay. Based on the standard practice, what 18:17
15 happens to that equipment? 18:17
16 MS. ROBERTS: Objection; form. 18:17
17 THE WITNESS: Depends on the circumstances. 18:17
18 MR. TAKASHIMA: Okay. 18:17
19 Q What does it depend on? 18:17
20 A Whether someone is on a litigation hold. 18:17
21 Hard stop. 18:17
22 Q Okay. Does it depend -- depend on anything 18:17
23 else? 18:17
24 A Whether or not there's an active 18:17
25 investigation. 18:17

1 Q Okay. When did you give the laptops to 18:17
2 Mr. Belanger? 18:17
3 A I don't remember the specific -- I don't 18:18
4 remember the specific date or timeline. Shortly 18:18
5 following Anthony's departure. 18:18
6 Q Within days of his departure? 18:18
7 A Within days, yeah. 18:18
8 Q At that time, was there a litigation hold on 18:18
9 Mr. Levandowski? 18:18
10 A Not that I'm aware of. 18:18
11 Q Okay. Would you be aware of a litigation 18:18
12 hold on Mr. Levandowski at that time? 18:18
13 MS. ROBERTS: Objection; form. 18:18
14 THE WITNESS: I'm not exactly sure. 18:18
15 MR. TAKASHIMA: Okay. 18:18
16 Q At the time you gave the laptops to 18:18
17 Mr. Belanger, was there an active investigation of 18:18
18 Mr. Levandowski? 18:18
19 A Good question. I'm not exactly sure of the 18:18
20 timing of handing the laptops over, in comparison to 18:18
21 when the active investigation began. 18:18
22 Q Well, did you hand the laptops over to 18:18
23 Mr. Belanger before the investigation began? 18:19
24 A I don't recall -- 18:19
25 MS. ROBERTS: Objection; form. 18:19

1 THE WITNESS: -- the exact sequence. 18:19

2 MR. TAKASHIMA: Q. Do you recall at all the 18:19

3 sequence? 18:19

4 A I don't. 18:19

5 Q When an employee departing is not subject to 18:19

6 a litigation hold or the subject of an active 18:19

7 investigation, what is typically done with their 18:19

8 devices? 18:19

9 A The coordinator -- the HR coordinator, in 18:19

10 this case, Travis, would turn them in to tech stop. 18:19

11 Q What is tech stop? 18:19

12 A Technical support and hardware support. And 18:19

13 I'm not exactly sure what they do, if they sort of 18:19

14 recycle and put equipment back in inventory. I'm not 18:19

15 sure what they do. I'd be speculating. 18:19

16 Q Okay. How quickly are devices usually handed 18:19

17 over to tech stop? 18:19

18 A Within a week. 18:19

19 Q Okay. 18:20

20 A Estimating. 18:20

21 Q After you gave Mr. Levandowski's laptops to 18:20

22 Mr. Belanger, what did he do with them? 18:20

23 A He -- I'm not sure if he shipped or delivered 18:20

24 them personally to Kristinn's team. 18:20

25 Q Okay. When did he do that? 18:20

1	A	I don't know the specific timeline.	18:20
2	Q	Okay. That would have been after an	18:20
3		investigation began; correct?	18:20
4	A	Yes.	18:20
5	Q	Okay. How much time passed between when you	18:20
6		gave the laptops to Mr. Belanger and when he delivered	18:20
7		them or caused them to be delivered to Mr. Gudjonsson?	18:20
8	A	Great question. And I'm not sure of the	18:20
9		exact timeline associated with that exchange.	18:20
10	Q	Okay. Was it more than a month?	18:20
11	A	I don't believe so.	18:20
12	Q	Okay. Was it less than a month?	18:20
13	A	I think so, but I'd be estimating. I don't	18:20
14		recall exactly.	18:20
15	Q	Was it more than a week?	18:20
16	A	Perhaps.	18:20
17	Q	Okay. Was it more than two weeks?	18:20
18	A	I'm not exactly sure.	18:21
19	Q	So, Mr. Belanger did not deliver the laptops	18:21
20		to tech stop; correct?	18:21
21	A	That's correct.	18:21
22	Q	Why not?	18:21
23		MS. ROBERTS: Objection; form.	18:21
24		I'll withdraw -- withdraw the objection.	18:21
25		Sorry.	18:21